

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Sean Conrad Kritzing	:	CHAPTER 13
Debtor	:	
	:	
Toyota Motor Credit Corporation	:	NO. 17-00664 JJT
Moving Party	:	
	:	
vs.	:	
	:	
Sean Conrad Kritzing	:	
Debtor	:	
	:	11 U.S.C. Section 362
Charles J. DeHart, III, Esq.	:	
Trustee	:	

MOTION FOR RELIEF FROM THE AUTOMATIC STAY

NOW COMES, Sean Conrad Kritzing, Debtor, by and through his attorneys, Sheils Law Associates, P.C., and answers the Motion of Toyota Motor Credit Corporation for Automatic Stay, as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Debtor's car payment is \$381.00 a month and upon information and

belief, Debtor owes for the months of July and September. By way of further answer, the August payment was made on August 14, 2017.

7. Denied. Upon information and belief, Debtor owes \$762.00 for the months of July and September.

8. (a) Denied. After reasonable investigation, Debtor is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph eight (a) and strict proof thereof is demanded.

(b) Denied. After reasonable investigation, Debtor is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph eight (b) and strict proof thereof is demanded.

9. Denied. After reasonable investigation, Debtor is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph nine and strict proof thereof is demanded.

WHEREFORE, Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief as Debtor will cure payments by the end of October.

Respectfully submitted,

Dated: October 9, 2017

/s/ Jill M. Spott
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